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September 22, 1997

Mr. William F. Caton
Federal Communications Commission
1919 M Street N.W. Room 222
Washington, D.C. 20554

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RE: RM 9005
IN Report Number 97-27

Dear Mr. Caton

The Satellite Communications Division of the Telecommunications Industry Association (TIA) hereby submits its comments in response to the FCC Reference Number RM 9005. This Reference Number pertains to "Proposals for Blanket Licensing of Satellite Earth Stations operating in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency Range and sharing between Fixed Terrestrial and Satellite Services in the 17.7-19.7 GHz Frequency Bands."

We request that the Commission accept these comments and consider them in the course of making determinations in this proceeding.

Sincerely,

Gerald S. Rosenblatt
Manager, Technical and Regulatory Affairs

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RM No. 9005

Blanket Licensing of Large Numbers of Small Antennas Operating in the Ka-Band

¹ TIA is a full-service national organization with membership of over 600 large and small companies, which provide communications and information technology products, materials, systems, distribution services and professional services in the United States and countries abroad. TIA represents the telecommunication industry in association with the Electronic Industries Association. Sometimes, a product-oriented division or a section of such a division will file in a proceeding representing the views of only the members of that division or section. In this instance, the filing is specifically from the Satellite Communications Division of the TIA.

Geostationary Orbit/Fixed-Satellite Service (GSO/FSS). Petitioners argued that blanket licensing in the 19.7-20.2 GHz, 28.35-28.6 GHz and 29.25-30.0 GHz bands is both feasible and essential, subject to the sharing principles specified in the 28 GHz First Report and Order.² Petition at 6. Petitioners also supported separate development of sharing criteria, licensing and registration procedures for GSO/FSS and Fixed Service (FS) terminals operating in the 17.7-18.8 GHz band.

3. Teledesic Corporation expressed its support for Petitioners' rulemaking, but urged the Commission to include consideration of blanket licensing in the 17.7-19.3 GHz and 28.6-29.1 GHz sub-bands in the proceeding. In its Reply, Petitioners did not object to Teledesic's request that the Non-Geostationary Orbit/Fixed-Satellite Service (NGSO/FSS) and GSO/FSS bands that are shared with FS be included in this proceeding. They did ask, however, that "separate Industry Working Groups be formed as quickly as possible to address the unique sharing issues of each sub-band in a timely fashion, and that the requested rulemaking proceeding be structured to permit the earliest possible adoption of blanket licensing procedures, by sub-band or service, as appropriate." Reply at 3.

4. Two developments have occurred in the Ka-band since these pleadings were filed which the Bureau feels necessitate additional public comment in this proceeding: (a) The Bureau issued a license to Teledesic for its proposed NGSO/FSS system in the 18.8-19.3 GHz and 28.6-29.1 GHz bands and (2) the Bureau authorized thirteen FSS companies to construct, launch, and operate their proposed GSO/FSS systems in the Ka-band. These developments, the Bureau feels, warrant additional comment on the range of issues involved in commencing a blanket licensing procedure for the Ka-band. The Bureau also asks whether sharing can be achieved between FS and satellite services in the 17.7-19.7 GHz band.

5. The TIA Satellite Communications Division believes that the Commission's

²Rulemaking to Amend Parts 1, 2, 21, and 25 of Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, to Reallocate the 29.5-30.0 GHz Frequency Band, and to Establish Rules and Policies for Local Multipoint Distribution Service and for Fixed Satellite Services, 11 FCC Rcd 19005 (1996)

initial focus should be to resolve blanket licensing GSO/FSS earth terminals operating in the 19.7-20.2 GHz and 29.5-30.0 GHz bands. Other issues, such as interservice sharing in other parts of the Ka-band, should be handled separately and should not delay progress on the matter of GSO/FSS earth station blanket licensing rules.³

6. Successful implementation of FSS requires a means to distribute and install large numbers of earth terminals across the U.S. without regulatory delay or operational complications. The only way to do this is through blanket licensing, which would permit large numbers of small antenna earth stations for use with FSS systems to be sold and installed with the same ease that cellular telephones are marketed and used today.

7. Blanket licensing is not without precedent. Section 25.134 of the Rules allows Very Small Aperture Terminals to be blanket licensed, and the Commission has issued blanket licenses for use in the L-band, and for both Little LEO and Big LEO systems. The alternative to blanket licensing -- coordination -- constitutes an unnecessary burden on the Commission and on industry, and delays the introduction of Ka-band satellite services. It also stifles competition among satellite communications services. The TIA Satellite Communications Division, therefore, strongly supports blanket licensing in the Ka-band and asks that the Commission implement it as quickly as possible.

8. In the 19.7-20.2 GHz, 28.35-28.6 GHz and 29.5-30.0 GHz bands, the TIA Satellite Communications Division recommends that the Commission proceed without delay to develop the technical standards needed to implement GSO/FSS earth station satellite blanket licensing. Because in these bands GSO/FSS operations are not shared with FS or MSS, the only technical issue involves sharing criteria for GSO satellite systems and terminals. These

³The TIA notes that if GSO/FSS Earth Stations are blanket licensed in the 29.25-29.5 GHz band, coordination with MSS feeder links will not be possible. Therefore, the TIA Satellite Communications Division does not take a position on blanket licensing in the 29.25-29.5 GHz band.

matters can be handled most effectively through industry meetings.


9. Sharing criteria for bands where there are interservice allocations, on the other hand, should be considered separately from GSO/FSS blanket licensing. The TIA Satellite Communications Division firmly believes that sharing among FS and FSS is feasible and it urges the Commission to turn to industry meetings to develop the necessary sharing standards to achieve blanket licensing rules in those bands.

Conclusion

The TIA Satellite Communications Division favors blanket licensing in the Ka-band and urges the Commission to move forward as quickly as possible to develop sharing criteria in the GSO/FSS 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.5-30.0 GHz bands. Industry meetings represent the most efficient means of developing the sharing criteria necessary, both in the GSO environment and where there is interservice sharing. The TIA offers to sponsor such industry meetings.

Respectively submitted,

SATELLITE COMMUNICATIONS DIVISION,
TELECOMMUNICATIONS INDUSTRY
ASSOCIATION



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